

# EXHIBIT 3

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

CIVIL ACTION NO. 22-CV-2420

\* \* \* \* \*

LACI N. BLANCHARD, Individually, and as next friend  
of W.B., surviving minor child of RONNIE P.  
BLANCHARD, JR.

VERSUS

SANARE ENERGY PARTNERS LLC, et al

\* \* \* \* \*

The Video and Oral deposition of HOUSTON JAMES  
LONDO, taken in connection with the captioned cause,  
pursuant to the following stipulations before Debra  
Smith, Certified Court Reporter, at the offices of  
ALL COAST, LLC, 151 Southpark, 3rd Floor, Lafayette,  
Louisiana, on the 11th day of December, 2024,  
beginning at 10:03 a.m.

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## S T I P U L A T I O N

It is hereby stipulated by and among counsel for plaintiff and counsel for defense that the Video and Oral deposition of

HOUSTON JAMES LONDO

be taken before Debra Smith, Certified Court Reporter, by counsel for the plaintiff for all purposes, pursuant to notice and to the provisions of the appropriate statutes of the Federal Rules of Civil Procedure.

The parties hereto waive all formalities in connection with the taking of said deposition, including the reading and signing thereof, except the swearing of the witness and the reduction of the questions and answers to typewriting.

Counsel for all parties reserve all objections, except as to the form of the question and responsiveness of the answer, until the time of the trial of this matter.

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1 Q -- the investigation, right?

2 A Yeah, investigation. Yeah.

3 Q What were they investigating?

4 A The platform fell. Some --

5 Q Okay.

6 A -- somebody was in the water.

7 Q There -- there's someone underneath the water

8 who hasn't come up --

9 A Yes, sir.

10 Q -- has he?

11 A Yes, sir.

12 Q Okay. You saw that happen, didn't you?

13 A Yeah, I seen it. Yeah.

14 Q Okay. Did you see the individual fall into the

15 water?

16 A Yes, sir.

17 Q Okay. Well, he was alive when he was on top of

18 that tower, wasn't he?

19 A Yes, sir.

20 Q And he never came up, did he?

21 A No, sir.

22 Q Did you see him hit his head on anything or do

23 you see him crashing into anything?

24 A No. It just happened so fast.

25 Q Okay.



1 A Blink of a eye.

2 Q But you -- you had full visual contact with Mr.

3 Blanchard as the tower fell over and he went

4 into the water, didn't you?

5 A Yes, sir.

6 Q Okay. After that happened, did you see -- did  
7 you get out of the crane and kinda run over and  
8 see if you could see anything?

9 A I -- I blew the horn, kept blowing the horn.

10 Q Okay.

11 A Kept blowing the horn and -- and the guy with  
12 the guy stayed right there. Some of the guys  
13 threw things, make sure they'd have anything  
14 that can float in case he pop up.

15 Q Okay. Did -- did anyone else or did you ever  
16 run up to the bow of the boat to see if -- see  
17 what happened or see if he would pop up?

18 A Yeah. Me -- me and the other guys.

19 Q Okay. And how long did y'all stand there kinda  
20 looking to see if he'd come up?

21 A We had to stay right there because you can't  
22 leave your position till somebody probably  
23 relieve you.

24 Q Oh, so you had to stay inside the crane?

25 A No. I came down where we was right here --

1 Q Uh-huh, (yes).

2 A -- and then we just stayed right there and  
3 throwing things in the water that could leave a  
4 trail in case he pop up with the current.

5 Q Oh, I see. Okay.

6 A Yes, sir.

7 Q Who was the other guy with you?

8 A I don't know him by name. It's just was  
9 different hands that was right there.

10 Q These were other SBS contractors?

11 A It was different guys. I -- I was in shock. I  
12 didn't know who was who.

13 Q Okay. And so how -- about how long from the  
14 time the crane, you know, completely toppled  
15 over did it take you to get to the water and be  
16 able to see this area?

17 MR. LeBAS:

18 You mean the tower.

19 A I don't -- I don't recall.

20 MR. LONG:

21 The tower.

22 MR. LeBAS:

23 You said the crane.

24 MR. LONG:

25 Yeah, sorry.

1 MR. LONG:

2 Q No. I said: how -- how long did it take you to  
3 get from the crane up to the bow of the boat?

4 Just a few seconds, right?

5 A Yeah.

6 Q Okay. And so y'all went up to the bow of the  
7 boat with these other hands from SBS and other  
8 contractors to start looking to see if you  
9 could see Mr. Blanchard, true?

10 A Yes, sir.

11 Q Okay. And y'all stood there for --

12 A I don't -- I don't know.

13 Q -- several minutes at least --

14 A Yeah.

15 Q -- to -- to see if he'd pop up?

16 A Yeah.

17 Q Okay. And did he ever pop up as long as you  
18 were standing there?

19 A No, sir.

20 Q Okay. And -- and to be clear, you had eye

21 visual contact, radio contact with Mr.

22 Blanchard before he fell and saw him fall into  
23 the water, correct?

24 A Yes, sir.

25 Q All right. Could you see that he was tied off

1 to the tower?

2 A Yeah. He still was tied off.

3 Q Okay. Did you hear him yell or scream or  
4 anything? Could you hear that?

5 A No, I couldn't hear nothing in the crane.

6 Q Okay. Were there other folks that were closer  
7 in eyesight to Mr. Blanchard than yourself when  
8 he fell over?

9 A Guys that was on the deck.

10 Q Okay. Other SBS employees?

11 A Different -- different third parties.

12 Q Okay. Guys that he was working with, right?

13 A Yes, sir.

14 Q All right. All right. Mr. Houston, can you  
15 see this area of the platform that appears to  
16 be broken in half?

17 A Yes, sir.

18 Q Okay. Can you tell from this picture if what  
19 part of the platform actually was severed and  
20 tipped and -- and -- and cut -- that caused the  
21 tower to fall over?

22 A Looking at the bottom of the structure?

23 Q Right. And so what you can see here, there --  
24 there's some BOP parts, green and red, that SBS  
25 was installing on this tower, correct?